



Template for submissions to the *Quality of assessment in vocational education and training – Discussion Paper*

Key consultation areas

The Department of Education and Training (the department) seeks stakeholder input on the *Quality of assessment in vocational education and training – Discussion Paper* (the discussion paper). The paper covers the following broad themes to improve assessment in vocational education and training (VET):

Chapter 1: Foundation reforms

- ensuring the requirements for VET teachers and trainers provide the strongest platform for high-quality assessment
- ensuring those teaching VET skills are highly competent professionals with high-quality, contemporary skills in assessment.

Chapter 2: Reforms to the assessment of VET students

- assuring the quality of assessment through industry engagement with assessment review and control mechanisms as a gatekeeper before qualifications are issued
- ensuring employers have clear and realistic expectations of VET graduate capabilities which align with the assessment of students.

Chapter 3: Reforms to the regulatory framework

- improving the detection of poor quality assessment
- ensuring quick action can be taken against registered training organisations (RTOs) delivering inadequate assessment
- managing the consequences of inadequate assessment by removing invalid qualifications from the system where necessary and supporting students if this occurs.

How to provide feedback

To support the Training and Assessment Working Group to provide the Australian Government Minister for Vocational Education and Skills with recommendations on how to improve assessment, stakeholder consultations will begin with the release of the discussion paper in January 2016 and continue through to Friday 11 March 2016.

Respondents may provide feedback on some or all of the discussion paper's themes. To assist with the compilation and analysis of the views of all stakeholders, respondents are encouraged to provide feedback via this preferred submission template, with attachments as required. Submissions in alternative formats will also be accepted.

All written submissions to the discussion paper and queries on the consultation process may be directed to the department via email at trainingpackages&VETquality@education.gov.au.

All written submissions will be made publicly available on the department's website, unless respondents direct otherwise. See the [terms and conditions for public submissions](#).

Submission details

1. Submission made on behalf of: Individual Organisation
2. Full name:
3. Organisation (if applicable):
4. Please indicate your interest in this discussion paper:
(i.e. as a student, VET practitioner, RTO, third-party provider, peak body, business, industry representative, regulator or other government agency or community member)
5. Do you want your submission to be published on the department's website or otherwise be made publicly available? Yes No
 - a. If yes, do you want your name and organisation (if applicable) to be published alongside your submission, OR would you like for only your submission to be available and your details kept anonymous? Published Anonymous
 - b. If no, please advise the department upon submission that you do not want your submission to be published or otherwise be made publicly available.

1. Discussion questions – RTO limitations:

- Is it appropriate for relatively large numbers of RTOs to deliver TAE qualifications or skill sets? Should the number be reduced to a targeted number of RTOs focusing on high-quality provision?
- Should RTOs be restricted from issuing TAE qualifications or skill sets to their own trainers and assessors?
- Are TAE qualifications and skill sets so significant that evidence of competence should not—or cannot—be appropriately demonstrated via recognition of prior learning?
 - Is recognition of prior learning for TAE qualifications or skill sets granted with sufficient rigour to ensure the quality of student assessment? Should the practice be restricted?
- Are there opportunities to improve the assessment skills of the VET workforce through changes to the delivery and assessment of TAE qualifications and skill sets?
 - Should TAE qualifications and skill sets only be delivered by VET practitioners who can demonstrate a specific period of training and/or assessing employment history in the VET sector?
 - What circumstances would support a change requiring some VET trainers and assessors to hold university-level or higher-level VET qualifications, for example, practitioners delivering and assessing TAE qualifications and skill sets?
 - Should the TAE Certificate IV and/or Diploma require a practical component? If so, how long should the practical component be?
 - Should entrants to the TAE Diploma be required to demonstrate employment history in the VET industry before being issued with the qualification? Would this condition help to improve the relevance and validity of assessment? How long would this period of time be?

COMMENT:

N/A

2. Discussion questions – skills and qualifications of trainers and assessors:

- Should the TAE Certificate IV be changed to a core unit on the design and development of assessment tools? How would this improve assessment outcomes for students?
 - Should the core unit be the existing *TAEASS502B Design and develop assessment tools* unit of competency? Are there alternative approaches, such as developing a new unit on the design and development of assessment tools?
 - Is the *TAEASS502B Design and develop assessment tools* unit of competency a specialist unit that should only sit at the diploma-level on the basis the Certificate IV is currently designed for delivery to new entrants seeking to be trainers and assessors?
- In the case of making any updates to the TAE, is it appropriate to form judgements based on majority considerations? Or is it too risky to do so? Is it a better basis for decision makers to give strong weight to key stakeholders and the nature of the argument put forward?

COMMENT:

N/A

3. Discussion questions – benefits and purpose of a VET professional association:

- Is there a need to establish a national professional association for Australia’s VET system?
 - Specifically, is there a clear role for Australian governments in assisting the development of professional skills of the VET workforce by funding a professional association?
- What are the barriers to establishing a national professional association? How could these be overcome?
- What would be the most useful guiding purpose of a national professional association?

COMMENT:

Is there a need to establish a national professional association for Australia’s VET system?

Establishing effective workforce development for VET is critical to the reputation of the sector; industry and employers confidence in the value of a qualification; and individual learners and employees gaining the skills to effectively perform in the workforce. A strong and credible national VET professional association would provide greater confidence in training outcomes and the integrity of vocational qualifications. The VET sector should be leading the way in development and implementation of an effective workforce development for its own.

Training provider compliance with assessment requirements has been an area of some concern and has led to a lack of confidence in the VET system by industry, community and students. Coupled with recent non-compliance issues and deregistration of many private RTOs, the integrity of VET qualifications is in question.

The concept of a VET Professional Association is not new – but now is the time to establish the peak body as a consequence of the recent concerns about VET and the crippling lack of confidence in the VET system by industry, community and students.

VETnetwork Australia’s activity to date

As outlined in the Discussion Paper, numerous scoping activities pertaining to the establishment of a National VET Professional Association which all show strong evidence and support for the need of such a body in Australia have been completed over the past decade. Following the review of vast literature into the matter (Ithaca Group 2010; Clayton & Guthrie 2011; Skills Australia 2011; & Wheelan and Moodie 2011) and the release of a paper exploring the concept by the VET Development Centre in 2011, a Roundtable was convened by Jodi Schmidt in August 2013 to test the viability of the concept of a national Professional VET Association in Australia which, again, confirmed and compounded overwhelming support for its progression.

A working group was subsequently convened by the Chief Executive Officer of TAFE Queensland to fully explore and compile a Business Case for a VET Professional Association (Condon, 2014). Members of the working group are a cross-section of leading experts in the sector nationally and include: Jodi Schmidt (Qld); Patsy Thomas (SA); Pam Christie (NSW); Julie Zappa (WA); Gail Eaton-Briggs (TAS); Vicki Burge (NSW); Jason Washington King (WA); Stephen Conway (TAS); Denise Stevens (VIC); Neil Fernandes (WA); Kate Oliver (WA); Dennis Tonkin (NT); Claire Baldwin (Commonwealth) and Rita Shanahan (secretariat). The desktop research reviewed over 20 research papers and examined 21 different professional associations. The research papers ‘identified a number of key benefits for the establishment of an association, not only for individuals but also for the wider community’ including, but not limited to: raising the level of status and professionalism of the VET

workforce; mentoring and professional development; advancing the quality of teaching and learning outcomes for students and industry; and providing a voice in relation to policy matters. VETnetwork Australia has since been working with members of the working group to continue to drive the agenda of establishing a VET Professional Association in Australia, culminating in a discussion with the Minister for Education and Training – Senator the Hon. Simon Birmingham in 2015.

Building on the work previously done in relation to the establishment of a professional VET association, VETnetwork Australia has been in discussion with, and is fully supported by, peak organisations and associations nationally who share similar concerns pertaining to measures that improve consistency in assessment practice and standards across RTOs and the means of ensuring that assessors and trainers have the capability to assess appropriately. After considerable consultation, there is significant and extensive support for the establishment of a peak professional association in Australia as a way of ensuring an improved VET focus and practice. With a long history of leading networking, professional learning and research in the sector, VETnetwork Australia is well placed to take carriage of the association and has been highly active in driving this agenda. As a national, independent, not-for-profit organisation VETnetwork Australia has the profile, presence and infrastructure to immediately support the implementation of a national VET Professional Association. Federal seed funding is crucial to support the immediate expansion of the current membership-base and the scale that will accompany a peak professional body.

Specifically, is there a clear role for Australian governments in assisting the development of professional skills of the VET workforce by funding a professional association?

The VET workforce is a large and significant component of the labour market in Australia. It has been heavily noted by both State and Federal Governments that the Vocational Education and Training Sector is crucial to the Australian economy, both for the development of the national workforce and as a major export industry. This is echoed in the Government's commitment to increasing the skills of our national workforce to support the economy as it undergoes a period of significant change, driven by a number of factors, including: infrastructure investment, new and emerging technology, the transition to knowledge and service-based industries, and, an ageing population and workforce – all of which necessitates the need for constant skilling and reskilling of staff.

There have been growing concerns about the inconsistencies in the quality of vocational education and training (VET) teaching and assessment which continues to challenge the integrity and value of Australian vocational qualifications, both nationally and internationally. The establishment of a VET Professional Association will provide a representative body for all VET practitioners and focus on aspirational standards to attract, retain and recognise highly skilled professionals, leading to improved quality education and training outcomes. To achieve reform across Australia's VET system and to support the associated economy and labour markets the VET sector needs to attract and retain a skilled and adaptable VET workforce to create the world's best practice in quality education and training outcomes.

Further investment is still required – but investment will have ongoing return and benefits through the development of Australia's national workforce and economy. It is important to note that the purpose of a Professional VET Association is not to duplicate the role or services of other bodies, but instead to add value to members' individual and collective endeavours, and play a unique role in building the strength and quality of the education and training system in Australia.

There is a strong case for VETnetwork Australia to take carriage of the Professional VET Association in Australia given our current presence, financial stability and performance within the sector. VETnetwork Australia is seeking

federal financial support for the initial establishment of the peak professional association; with a view of becoming fully self-funded through membership over a three-year period. As a peak representative body with a national focus, there must be discernible national support at the federal level to bolster confidence in practitioners, industry, community and students about ensuring the ongoing capability and capacity of the sector. The VET workforce is significant and is crucial to the Australian economy, as an area of national focus, investment federally plays a large role in the Government's commitment to increasing the skills of our national workforce and, in turn, the economy. VETnetwork Australia, as an independent, not-for-profit, would be seeking once-off seed funding from the Government to realise the establishment of a national VET Professional Association in Australia, and is not seeking recurrent funding.

What are the barriers to establishing a national professional association? How could these be overcome?

- I. **Financial** – Initial seed funding is required to establish a national VET Professional Association. For a range of reasons aforementioned within the response, ideally this investment would come from a federally funded, once-off outlay. The VET Professional Association would become sustainable through its membership – Government funding would not be recurrent. Funding may also be sought from a range of stakeholders, including State Governments and industry. Initial, federal funding would have a significant impact on sector perception and work to bolster support for the VPA – aiding the effort to gain critical mass upon launch.
- II. **Traction** – This is two-fold: firstly, the Association must have critical mass to become sustainable and secondly, to gain critical mass the Association must be of value to the VET Practitioner to ensure ongoing membership. The central question in the exploration of the establishment of a VET Professional Association is – will Practitioners join (?). Fundamental to the success of the Professional Association is that it centres on what practitioners, and other VET professionals, value (i.e. member benefits). The Association must offer practitioners and other VET professionals the opportunity to improve their status and improve their own professional view by engaging them in the national conversation about VET, improving delivery and maintaining professional practice.
- III. **Reputation** - The Association must be fair and equitable to all states and territories. Jurisdictional rivalry or rivalry to take carriage of the VET Professional Association may in fact work to discredit the association. Each TAFE, through members of TAFE Directors Australia, in principal support the establishment of a VET Professional Association. The Association must work to foster partnerships and engagement to ensure every voice is heard. This may be acknowledged through a Working Party with state/territory representation in the initial stages of establishment. It is crucial that the lead organisation is independent and a not-for-profit – highlighted in much of the previous works surrounding the VPA. VETnetwork Australia has developed an unrivalled reputation in the VET sector through its 20 year history of support for teachers and professionals who work with youth in transition between school and work. More recently VETnetwork Australia worked with the Australian Government in providing the mentoring of Australian Apprentices (the Mentoring Australia's Apprentices Project [MAAP]) and developed excellent relationships and connections to industry. Carriage of the VET Professional Association through VETnetwork Australia would bring immediate support from the sector.
- IV. **Duplication** - The purpose of a Professional VET Association is not to duplicate the role or services of other bodies, but instead to add value to members' individual and collective endeavours, and play a

unique role in building the strength and quality of the education and training system in Australia. There are many professional associations that currently serve the sector, however most other associations focus on the employer or peak practitioners – they do not focus on the employee/practitioner.

The above barriers are not exhaustive but offer a general overview of the main barriers to establishing the national VET Professional Association. Other barriers have been identified via SWOT analysis in 'The Business Case for a VET Professional Association' (2014) including (but not limited to): adequate marketing of the Association (and the funds to achieve this); cost/value of membership; and appropriately skilled staffing.

What would be the most useful guiding purpose of a national professional association?

Unease in the sector about the inconsistencies in the quality of vocational education and training (VET) teaching and assessment continues to challenge the integrity and value of Australian vocational qualifications. A VET Professional Association will provide a representative body for all VET practitioners and focus on aspirational standards to attract, retain and recognise highly skilled professionals, leading to improved quality education and training outcomes.

Training provider compliance with assessment requirements has been an area of some concern and has led to a lack of confidence in the VET system by industry, community and students. Coupled with recent non-compliance issues and deregistration of many private RTOs, the integrity of VET qualifications is in question.

It is imperative to strengthen the skills of VET trainers and assessors in critical areas of assessment principles, moderation and validation. The recent discussion paper 'Quality of Assessment in vocational education and training' identifies, amongst other considerations, the need for consistency in assessment practice and standards across RTOs and the means of ensuring that assessors and trainers have the capability to assess appropriately. The need for a VET Professional Association is one way of ensuring an improved VET focus and practice.

The implementation of a national peak body, representing and advocating on behalf of VET Practitioners, will provide the following benefits to the sector:

- Restore confidence in training and assessment outcomes and the integrity of vocational qualifications
- National consistency – one set of VET educator capability standards
- Provide a professional identity for the VET workforce
- Advocate for practitioners and the sector to lift its status

The VET Professional Association will focus on four key elements:

- **Professionalism** – promote excellence in VET practice
- **Workforce development** – provide support through Professional Development and related member services
- **Advocacy** – provide leadership on behalf of VET Practitioners
- **Accreditation and teacher standards** – endorse and promote qualifications and teaching standards

Establishment of a national professional association would provide a peak body to govern and regulate the quality of VET assessment and training, ensuring trainers and assessors are highly competent, skilled, knowledgeable and experienced. There is potential to introduce Registration for VET practitioners in the future which a VPA would be very well positioned to administer.

Previous exploration into establishing a professional association also highlighted the need to clearly define the function and purpose of a VET Professional Association (VPA), and further that this must be differentiated from any role performed by unions. Integral to the success the professional association is that it works collectively with unions. There should be clear understanding between the two that the '...association would assist in strengthening and supporting the role of the union in raising the professional status of the VET workforce rather than in conflict with them' (Condon, 2014).

The establishment of a Professional VET Association in Australia is not new in concept and considerable research and debate has taken place over the past decade but now is the time to establish the peak body as a consequence of the recent concerns about VET.

4. Discussion questions – potential activities of a VET professional association:

- What activities would be most beneficial for a national professional association to undertake?
For example, would it:
 - coordinate, approve or design professional development programs
 - develop capability frameworks
 - positively promote the profession of VET trainers and assessors as an employment destination and career path to attract professionals
 - act as an advocate and voice for VET trainers and assessors
 - interact with industry to respond to their emerging needs
 - register VET practitioners?
- What advantages would there be to conducting these activities at a national level rather than through existing professional development undertaken through membership of existing groups, or that which is currently organised by RTOs?
- Are there any existing organisations that could fulfil this role?

COMMENT:

What activities would be most beneficial for a national professional association to undertake?

The fundamental benefit of a national VET professional association (VPA) is to recognise, promote and develop the workforce which it represents. A peak national body will provide a platform which brings all VET professionals voices into the consultation process, policy and quality debates. The scoping activities aforementioned throughout this response have identified what the sector perceives to be the most beneficial activities / services a national VET Professional Association would / should provide. It is noted within the Business Case for a VET Professional Association (2014) that respondents 'considered that a website, 'endorsed' professional development, professional standards, regular newsletters, webinars, online resources and the establishment of networking opportunities including communities of practice should be available from the start...'. Building and expanding on this VETnetwork Australia considers the following be undertaken by the VPA:

Professionalism

Endorsement/Accreditation/Status/Integrity

A key benefit to the establishment of a national peak body would strengthen professionalism across the sector. The association would positively promote the profession and **promote excellence in VET practice** and will **benchmark quality in Professional Learning** – through a range of intergrated activities, such as (but not limited to) the coordination, endorsement and/or design of professionals development programs, and providing practitioners/professionals the mechanism to record their Continual Professional Development (CPD) electronically throughout their career trajectory. The Association should provide a 'one stop shop' for members.

Registration – A fundamental objective of such a body will be the establishment of a registration process. This process will be linked to the Capability Framework and support the advancement and recognition of professionals through Continuing Professional Development including the recording of higher recognised qualifications, endorsed Professional Development and the ability to submit industry experience as part of an individual's Professional Profile.

Workforce Development

The VPA will provide workforce development advice to RTOs through partnering, endorsing, promoting and delivering PD programs to VET Practitioners nationally.

A central role of the VPA is to provide a model of engagement between industry and teaching & assessing, such as interacting with industry through liaising with Skills Services Organisations (5x) to rebuild confidence in industry. A key role for the VPA will be building, and rebuilding, industry confidence in the VET system through overseeing quality Training and Assessing of the TAE.

Advocacy

The VPA should provide leadership on behalf of VET practitioners. The VPA should liaise with other peak bodies and key stakeholders to restore confidence in VET practice

Standards

The VPA would work in partnership with existing associations nationally to provide overarching endorsement / accreditation of preferred providers to deliver the TAE:

- Endorsing VET teaching qualifications.
- Endorsing quality providers of the TAE qualifications.
- Approved provider list.

Research

The VPA should undertake applied research that will be of benefit to industry. This was thoroughly investigated in the 'Business Case for a VET Professional Association' (2014) which outlines significant support for a VPA to engage with research '...including from those organisations that are known for their research in the VET sector'. Thus, a function of the VPA is to engage in research activities that are collaborative and that add value to the sector.

In addition to the above, the 2014 Business Case for a VET Professional Association, through respondent feedback, also identifies a range of services or activities a professional association should provide. These include, but are not limited to:

- Webinars, social media / social networking
- A national job listing
- Volunteering options
- Newsletters
- Forums
- Speaking events
- Resources
- Sponsorship of industry events

What advantages would there be to conducting these activities at a national level rather than through existing professional development undertaken through membership of existing groups, or that which is currently organised by RTOs?

At present there is no one, coherent voice for VET practitioners and professionals. In order to achieve some of the fundamental activities mentioned above successfully, there needs to be one, unified, voice with enough size and 'grunt' (2013 Roundtable) to do so. Currently, none of the above listed activities are done nationally. A

national body can promote the above activities through implementing a (national) VET Practitioner Capability Framework - to provide greater confidence in training and assessment outcomes & the integrity of qualifications, to lift the professional identity for the VET workforce and to support the emerging skills profile of the VET professional. An overarching, independent peak body also unites a collective voice in regards to advocating for the sector, contributing to and enacting policy. A national peak body would enable national consistency through the endorsement and promotion of a national capability framework.

Are there any existing organisations that could fulfil this role?

There are a number of organisations/associations that could fulfil some aspects or functions of a peak VET Professional Association, but VETnetwork Australia is at the point where we are ready to extend and expand our Member Services to launch a national VET Professional Association in Australia. Previous research into the establishment of a VPA found that 80% of respondents felt that no one existing body could adequately represent the entire VET sector and, as a result, most indicated that a new body needed to be established. Furthermore, the respondents agreed that the lead organisation 'should be established as an incorporated body, not-for-profit and with a constitution, including terms of reference for a Board and any other internal structures' (Condon 2014). The emphasis of the organisation being not-for-profit is significant as it allows for membership fees to be tax deductible, as well as allowing for tax exemption on income – allowing this income to be directed toward meeting the VPA's objectives (Condon 2014).

VETnetwork Australia (VA) has a strong 20-year history as a member based organisation providing professional support and advocacy to VET practitioners working in schools, training providers and industry settings. With strong partnerships across governments, industry partners, national VET peak bodies, schools and related organisations VETnetwork Australia is well placed to leverage these partnerships to promote, manage and expand the VET Professional Association. VETnetwork Australia is a well governed and structured organisation that is independent, financially viable and sustainable with a clear vision to improve VET practice so as to restore trust in the quality teaching & assessment of the Australian VET sector.

VETnetwork Australia has been a member-based organisation for 20 years during which time strong networks have been forged with schools, industry and employers, at both a national and international level. VETnetwork Australia has an existing national presence and profile from which to build the VET Professional Association.

- strong partnerships nationally across the sector
- VETnetwork Australia has reach to every state and territory
- independent and with a nationally representative Board
- sustainable with strong systems and infrastructure
- member focussed, not for profit organisation
- provider of professional learning programs, conferences and services on behalf of members, government and related organisations
- a suite of publications and electronic resources

5. Discussion questions – models for a VET professional association:

- Which of the suggested models for a VET professional association would be considered most preferable and viable in the current VET environment? Model A,B or C?
- What value would a VET professional association, or associations, add to the VET sector?
- What mechanism would sustain a professional association, for example, membership fees from individuals or RTOs?
- Should VET teacher and trainer membership with a professional association be mandatory or voluntary?

COMMENT:

Which of the suggested models for a VET professional association would be considered most preferable and viable in the current VET environment? Model A, B or C?

VETnetwork Australia considers **Model B** to be the most preferable and viable in the current VET environment. VETnetwork Australia has consensus with peak representative bodies nationally that a VET Professional Association must be hosted by an independent organisation, operating as a not-for-profit – ideally with a profile and presence in the membership/VET space. This model most closely reflects what previous research and consultation with key stakeholders has identified in building a model for Australia. There is broad agreement that VETnetwork Australia will take the lead role in establishing the VPA in Australia but will work in partnership with other organisations to advocate for and on behalf of, VET practitioners, to strengthen their capability and to promote and endorse best practice nationally.

Model B would enable effective Governance of the new VET Professional Association. Significant emphasis has been made in relation to the need of partnerships and engagement from many organisations to ensure the broad contingent of the VET sector is represented, and therefore ensure the ongoing success (and currency) of the VPA. Model B would enable the VPA to implement a Governance structure to best serve the VPA, for example a Board of Directors (skills based), Executive Officer, and an Advisory Council. This Advisory Council may consist of representatives from TDA, ACPET, VET Development Centre – and others.

Model B also supports VETnetwork Australia's vision of building a sustainable VPA model. VETnetwork's proposal outlines that initial federal seed funding is granted to establish the VPA, with the potential of sourcing some funds from elsewhere (such as State Governments), with a view of becoming self-funded through income gained via membership. VETnetwork Australia, under this model and as the lead organisation would continue to operate as a not-for-profit – the benefits of which are outlined in detail above. Model B, with VETnetwork Australia as the host organisation, offers a sustainable model that will not require recurrent Government funding.

Whilst Model A would be workable under certain conditions it undermines many of the findings from the research to date about what the sector wants from a Professional Association. Model A would destabilize a united, coherent voice of the sector. Model A may challenge the fundamental role of a VPA – in that the agenda may be driven by the Government and/or peak professional organisations rather than driving the agenda of the VET workforce in totality, with the Practitioner at the centre. It is unclear about the funding or funding model attached to Model A.

Model C is not viable. This model would completely undermine the purpose of driving the agenda for an independent, peak VET Professional Association. Extending school teacher registration to the VET sector would run a high risk of further diminishing the status of the VET practitioner, as opposed to empowering the workforce

through targeted, meaningful activities. Model C fails to recognise the VET workforce in entirety – while the VET Professional Association acknowledges that Practitioners are at the centre of improving quality teaching and assessment in VET, the VET workforce as a whole must be included in the solution.

What value would a VET professional association, or associations, add to the VET sector?

Building on what has already been outlined within this response - the VET workforce is comprised of:

- 5 900 VET providers
- 1.8 million students
- An estimated 223 000 employees

There is no one, single body that represents this large and significant workforce. The quality and competency of the VET workforce is central to the issue in the ability of RTOs to deliver quality training and assessment, and issue qualifications that have integrity. To achieve reform across Australia's VET system and support the economy and labour markets the VET sector needs to attract and retain a skilled and adaptable VET workforce to create the world's best practice in quality education and training outcomes.

The VPA would provide an overarching, peak body to establish, develop and/or improve: professionalism, advocacy, standards and workforce development across the sector. A national VET professional association has the potential to add value to VET professionals by supporting personal and professional growth through Continuing Professional Development (CPD); providing networking opportunities for likeminded professionals; promoting and providing examples of best professional practice; and establishing a credible VET identity.

A VPA has the potential to add:

- Standards – to create, endorse and promote a set of aspirational standards that represents and improves members' professionalism and recognition of this throughout their career trajectory.
- Establish a professional identity that recognise and supports educators at the pinnacle of reform, quality and practice.
- Continuing Professional Development (CPD) – access to a range of high quality CPD or training programs to support progression, career knowledge and expertise in partnership with aligned organisations in the sector.
- Provision of valuable learning content – access to academic literature and resources that highlight innovation and effective practice.
- Networking – an active practitioner community to discuss effective teaching and learning practice (professional development and research) and leverage VET expertise, enabling a connected workforce.
- Advocacy – promoting the profession; advising government on policy settings; and representing a collective and unified voice on policy decisions affecting the future of the profession.

What mechanism would sustain a professional association, for example, membership fees from individuals or RTOs?

The funding model explored by VETnetwork Australia, building on previous works, is to gain initial seed funding to establish the VPA with a view of becoming fully sustainable through Membership Fees and other membership services. Membership fees would come from the individual and/or the RTO.

Previous investigation into a Membership structure which would be considered by VETnetwork Australia suggest potential membership types as: Affiliate; Associate; Foundation Member; Full Member; Part-time or casual member; Registered member; Fellows; RTO Membership and Group Membership.

Any membership fees must represent value for money and member benefits must not duplicate services already provided by other associations. Fundamental to the VPA should be a focus on

- Partnerships / collaboration
- Member focussed (benefits and activities)
- Inclusivity (must be open to all VET professionals)
- Member driven

Should VET teacher and trainer membership with a professional association be mandatory or voluntary?

There is considerable debate in regards to mandatory vs voluntary membership, and there is merit in both. Mandatory membership would immediately streamline the sector and has the potential to rapidly raise the status and integrity of VET practitioners (providing the Association has been structured correctly etc.). However, the fundamental role of the VPA is the focus and impact on the Learner and restoring confidence, capacity and capability in the Learner. Initial membership should be voluntary. An accreditation system for the individual is complex and may prove problematic to address from the outset, though building accredited programs and courses that enable Practitioner registration holds significant value – and the VPA would be well positioned to assume this role.

6. Discussion questions – capability frameworks:

- What can be learnt or applied from the capability frameworks that have been developed or are currently being developed?
 - Is there an opportunity to make better use of these frameworks, irrespective of proposals to develop a professional association?

COMMENT:

There are a number of comprehensive Frameworks developed that are valuable. For example, IBSA's 'VET Practitioner Capability Framework' is one such model that could be adopted. These frameworks can assist in fast-tracking what works / what doesn't work, and enable refining of what aspects of a framework are most important and/or useful in the sector. In this regard the ground work has been done – there is no use reinventing the wheel but building on what already exists.

The VET workforce is large and diverse. These frameworks offer a strategic approach to workforce development including: identifying skills gaps, the 70:20:10 model, talent management, succession planning, mentoring – which is where standards and capability frameworks could be better used. At present there is a 'scatter-gun' approach to addressing workforce development in the sector. There is ample capacity to simplify existing frameworks so they are better utilised across the sector to recognise and promote formal, informal and social learning. Establishing effective workforce development for VET is critical to the reputation of the sector; industry and employers confidence in the value of a qualification; and individual learners and employees gaining the skills to effectively perform in the workforce.

A national peak body, such as the VET Professional Association, could act to bring all of the above together, through endorsing and promoting quality frameworks, and further by better equipping members to enable them to be put into practice.

7. Discussion questions – increasing industry confidence:

- Are there alternative approaches not covered in this discussion paper on how industry can increase engagement with the conduct of assessment, but not specifically the validation?
- Are there other ways to ensure industry confidence in assessment without requiring independent validation of assessment? For example, are industry-endorsed, externally administered tests a practical alternative to ensure that VET graduates are competent?
 - What would be the benefits and drawbacks in requiring such tests? Under what circumstances would they be mandated, for example, for particular student cohorts? Should these be specified in training products?
 - Who should regulate the tests?
 - Should such a test be a pass/fail dichotomy, or would it be more important to use the test to identify gap training?
 - Is the concept of an externally administered test, such as a test required before receiving a qualification, inconsistent with the premise of a competency based VET system?
 - Should the results of tests be made public at the RTO level?

COMMENT:

N/A

8. Discussion questions – the role of industry in assessment:

- What role should industry, for example, employers and industry organisations, play in validation of assessment? Does the varied interpretation of 'industry' inhibit a proper appreciation of the topic and should it be defined? If so, who would best define 'industry' when considering the practice of validating assessment?
- Do employers or industry groups have the skills required to fulfil this role in validating assessment? Is assessment such a specialised skill that industry and employers either do not want to get involved or should not get involved?
- Is there a need to build industry capacity and capability regarding involvement with training and assessment? If so, how might this be done?
- How can we ensure engagement with industry is appropriately targeted so it does not add undue burden and is targeted to those within industry with appropriate expertise required for validation of assessment?

COMMENT:

N/A

9. Discussion questions – specific models:

- How can independent validation be best applied to avoid a 'one size fits all' approach? For example should independent validation of assessment be triggered by:
 - improving RTO practice, for example, through a principles based model and best practice guide to support the VET workforce in identifying the most appropriate technique to validate assessment
 - mandatory requirement to lift quality in specific instances, for example, where a qualification is identified as high-risk
 - funding requirement, for example, independent validation of assessment could become a requirement for RTOs seeking to access government funding.
- Should there be an increased role for external assessment by industry, and in which situations? For example, should it be mandatory for certain industries where there is a concern for public safety if a learner is incorrectly deemed competent?
- If independent validation of assessment is to be risk-based, then what factors should be considered in the assessment of risk, for example, public safety, RTO profile, student cohort?
- Should high-risk student cohorts be required to undergo independent reassessment of industry-agreed sets of competencies before being issued with their qualifications?
 - For example, particular qualifications; students undertaking qualifications with RTOs with high levels of non-compliance; or that conduct assessment wholly online or on-the-job; or in areas of public safety.
- Would the burden be too great if independent reassessments were required for an entire student cohort, and should independent reassessment apply to a sample of students instead? If so, how could such a sample be chosen?
- Who would be most appropriate to oversee the reassessment of qualifications?
 - For example, could existing regulators or other organisations (such as firms that specialise in assessing students) take on this role?

COMMENT:

N/A

10. Discussion questions – industry expectations and graduate capabilities:

- Is there a role for Government or industry to develop resources outlining VET graduate expectations for particular training products? If so, who should take this work forward?
 - Do higher order issues need to be resolved regarding terminology such as ‘competent’ (as assessed against the training product) and ‘job ready’ (ready to undertake all aspects of a particular job)? Is there a common understanding of VET system outcomes?

COMMENT:

N/A

11. Discussion questions – evidence of assessment and graduate competency:

- Should the Standards for RTOs be revised to include strengthened and more specific rules around the conduct of and evidence to support assessment? Which elements that have a clear link to quality of student outcomes need to be strengthened?
- Would a more prescriptive condition of registration, such as a requirement for RTOs to retain all assessment samples for a longer period, improve the quality of assessment?
- How could the focus of regulation move to evaluating assessment outputs, such as samples of students' assessment pieces, without incurring excessive costs or imposing excessive burden on RTOs?
 - Is ASQA the appropriate regulator to oversee this function, or are there better placed agencies such as firms that specialise in assessing students?
- Are there other mechanisms that you would like to see added to the regulatory framework to prevent poor assessment? For example, should training-only RTOs be recognised as a formal part of the regulatory framework?

COMMENT:

N/A

12. Discussion questions – enforcement:

- How could the focus of regulation move to evaluating assessment outputs?
- Which additional regulatory enforcement options should be considered in dealing with RTOs providing inadequate assessment? For example, should the regulator have an explicit administrative power to require a RTO to arrange and fund external reassessment, or should additional civil penalty provisions be created?
- To what extent should the characteristics of the RTO influence the response? Should the size of the RTO or the number of students involved matter?
- Given the need to balance procedural fairness with swift and effective enforcement action, what methods should be available to the regulator to manage RTOs that are repeatedly non-compliant with assessment requirements? How could such repeat offenders be defined?
- What role should regulators have in communicating their activities and findings? Does current regulatory practice provide adequate transparency and disclosure, or are there other approaches that should be taken?

COMMENT:

N/A

13. Discussion questions – cancellation and reassessment:

- Where inadequate assessment has occurred, should the power to cancel qualifications be exercised more frequently than it has in the past? What factors should affect this decision (for example, potential impact on public safety) and how should they be balanced?
- Should a scheme for the reassessment of students be implemented? If so:
 - Are there any situations where a student should not be offered the chance to be reassessed, for example, student fraud?
 - Should there be a time period after which ASQA should not move to cancel an individual's qualification? Noting potential public and other safety issues, should a decision to cancel consider whether or not the person involved is reliant on the qualification for their current employment?
 - Who should bear the cost of reassessment and any gap training found to be necessary? If the cost is to be recovered from the RTO, should this be pursued regardless of the RTOs financial viability?
 - Who should deliver the reassessment? Are there any circumstances in which it would be appropriate for the original RTO to undertake the reassessment?
 - What should the qualifications be for those doing the reassessment, and what industry experience and currency would they need? To what extent should ASQA, industry or employers be directly involved in the reassessment process?
- Should a tuition assurance fund be set up to further protect students in Australia's VET sector, particularly in the context of any scheme of reassessment or cancellation of qualifications? Should membership be mandatory for all RTOs? Who should operate such a fund, and who should bear the cost of its operation?
- What linkages with income support eligibility should apply for graduates impacted by any recall of qualifications?

COMMENT:

N/A